

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

APR 17 2019

David J. Bradley, Clerk

United States of America

v.

Blanca Iveth CUELLAR-Salazar (Y.O.B. 1984)  
Citizenship: MexicoCase No. M-19-0858-MDefendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 16, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

21 USC § 952  
21 USC § 841

## Offense Description

knowingly and intentionally import into the United States from Mexico approximately 14.26 kilograms of cocaine, a Schedule II controlled substance, and did knowingly and intentionally possess with the intent to distribute approximately 14.26 kilograms of cocaine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.Submitted by reliable electronic means, sworn to  
and attested to telephonically per Fed. R. Cr.4.1,  
and probable cause found on:Approved Michael Mitchell 4-17-19

Sworn to before me and signed in my presence.

Date: 04/17/20198:39 amCity and state: McAllen, Texas

Complainant's signature

J. Michael Salinas, HSI Special Agent

Printed name and title



Judge's signature

U.S. Magistrate Judge Peter Ormsby

Printed name and title

**Attachment "A"**

On April 16, 2019, at approximately 1:33 p.m., Blanca Iveth CUELLAR-Salazar, a Mexican citizen, applied for admission into the United States at the Hidalgo, Texas Port of Entry. CUELLAR-Salazar was operating a white in color Nissan Sentra bearing Mexican license plates A50-THX-1. CUELLAR-Salazar provided a negative declaration at primary inspection and stated that the purpose of her trip to the United States was to go shopping. CUELLAR-Salazar was referred for a secondary inspection where a Customs and Border Protection K-9 alerted to the odor of narcotics within the vehicle. An x-ray scan of the vehicle revealed anomalies in the vehicle's gas tank. An in-depth inspection of the vehicle resulted in the discovery of twelve (12) packages containing 14.26 kilograms of cocaine which were concealed in the gas tank. The gas tank opening appeared to have been altered with after-market cuts to the metal which allowed the rectangle shaped packages to fit inside of the tank.

CUELLAR-Salazar was interviewed by Homeland Security Investigations Special Agents Joe Michael Salinas and Victor Garza. During the interview, CUELLAR-Salazar admitted knowledge that she was involved in illegal activity however, claimed that she believed she was transporting bulk currency into the United States from Mexico. CUELLAR-Salazar stated that when she was recruited, she was told that she would be paid \$500 in U.S. currency to cross bulk currency into the United States from Mexico and \$1,500 in U.S currency to cross illegal drugs into the United States from Mexico. CUELLAR-Salazar admitted to crossing what she believed was bulk currency into the United States approximately seven (7) times in the last year and was paid \$500 in U.S. currency each time. The vehicle that CUELLAR-Salazar was operating was registered under her name and she had twenty-two (22) crossings into the United States from Mexico between January and April 2019.